

101 Hualalai St.
Hilo, HI 96720
May 15, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

1999 MAY 24 11:58

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To Whom It May Concern:

I am in favor of FDA maintaining the present regulations requiring foods that have been processed with irradiation to be clearly labeled as such. The label should be prominently displayed on the front of the package, or, in the case of foods sold without packaging, on a poster prominently displayed near the food. The label should include both the words "irradiated" or "treated with irradiation" and the international "radura" symbol.

It has been established by FDA and others that irradiation can produce changes in food texture, flavor, and shelf life, among other qualities, which are not obvious to the consumer. The consumer therefore has a right to know that this process has been used, just as with any process or additive which affects the quality of food.

It is important that the word "irradiation" or "irradiated" be used on the label, and not a term such as "cold pasteurization," which is inaccurate and misleading, since pasteurization involves heating food and does not involve ionizing radiation. Similarly, it is important that the label be prominently displayed so the consumer has a fair opportunity to decide whether or not to purchase irradiated food.

As a pediatrician who is concerned with the health of my patients and my community, I urge you to uphold FDA's role of informing and protecting our citizens. Accurate and effective labeling is an essential safeguard for the consumer's right to make informed choices about food and nutrition. Please do not remove this important requirement.

Thank you very much.

Sincerely,



Mark L. Cohen, M.D., F.A.A.P.

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